

4. In order to avoid incurring additional legal expenses related to litigation, and to allow the Parties to focus their efforts on facilitating a settlement, the Parties respectfully request that the Court stay all upcoming deadlines in the First Amended Case Management Order (ECF Doc. No. 47), including those related to class certification.

5. The Parties shall file a joint status report within thirty (30) days apprising the Court of the status of the settlement and propose deadlines related to preliminary and final approval.

6. This request is not being made for purposes of delay.

WHEREFORE, the Parties respectfully request that the Court stay all pending deadlines. A proposed order is attached for the convenience of the Court.

Respectfully submitted,

Dated: May 31, 2022

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 31, 2022, the foregoing was filed electronically with the Clerk of Court using the CM/ECF System and was thereby served on all counsel of record.

/s/ William B. Federman
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